

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

KRAFT FOODS GLOBAL, INC., THE	)	
KELLOGG COMPANY, GENERAL	)	
MILLS, INC., and NESTLÉ USA, INC.,	)	
	)	
Plaintiffs,	)	No. 1:11-cv-08808
	)	
v.	)	Judge Charles R. Norgle
	)	
UNITED EGG PRODUCERS, INC.,	)	
UNITED STATES EGG MARKETERS,	)	
INC., CAL-MAINE FOODS, INC.,	)	
MICHAEL FOODS INC., and ROSE ACRE	)	
FARMS, INC.	)	
	)	
Defendants.	)	

**PLAINTIFFS' OMNIBUS MOTION *IN LIMINE*  
TO EXCLUDE IRRELEVANT AND PREJUDICIAL EVIDENCE**

Plaintiffs, by and through their undersigned counsel, and for the reasons set forth in the accompanying Memoranda of Law, respectfully request that this Honorable Court grant Plaintiffs' Omnibus Motion in Limine to Exclude Irrelevant and Prejudicial Evidence, including the following:

1. Liability Evidence Concerning Conduct or Events After 2008, and Evidence Not Produced in Discovery ("MIL No. 1")
2. Evidence of Post-2008 State Laws When Offered to Contest Liability ("MIL No. 2")
3. Evidence and Testimony About a December 2011 News Segment About Non-Party Sparboe Farms ("MIL No. 3")
4. Reference to Prior Lawsuits or Trials ("MIL No. 4")
5. Evidence Regarding Grocers and Certain 30(B)(6) Witness Testimony ("MIL No. 5");
6. Reference to Family Farms ("MIL No. 6")

7. Reference to the Action or Inaction of Any Federal or State Antitrust Regulator or the U.S. Department of Agriculture (“MIL No. 7”)
8. Testimony Pertaining to John Mueller’s Prior Discipline (“MIL No. 8”)

To avoid duplication, Plaintiffs include a statement of facts applicable to all Memoranda of Law (“Omnibus Statement of Facts”) in MIL No. 1. The Omnibus Statement of Facts is not repeated in the remaining Memoranda of Law.

August 26, 2022

Respectfully submitted,

***Counsel for Plaintiffs Kraft Foods Global, Inc.,  
General Mills, Inc., Nestlè USA, Inc. and The  
Kellogg Company***

/s/ Brandon D. Fox

James T. Malysiak  
Joel T. Pelz  
Angela M. Allen  
JENNER & BLOCK LLP  
353 N. Clark Street  
Chicago, IL 60654  
Tel: (312) 222-9350  
Fax: (312) 527-0484  
jmalysiak@jenner.com  
jpelz@jenner.com  
aallen@jenner.com

Brandon D. Fox  
Amy M. Gallegos (*admitted pro hac vice*)  
JENNER & BLOCK LLP  
515 South Flower Los  
Angeles, CA 90071  
Tel: (213) 239-5100  
Fax: (213) 239-5199  
bfox@jenner.com  
agallegos@jenner.com